



April 16, 2025

VIA ECF

The Honorable Justin T. Quinn
U.S. Magistrate Judge
U.S. District Court, District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: John Doe v. Princeton University, Case No. 3:22-cv-5887-RK-JTQ,
Request for Leave to File Reply Letter**

Dear Judge Quinn:

On behalf of Plaintiff, John Doe, we respectfully request leave to file a short, three-page letter reply to Princeton's response (Dkt. No. 100) to Mr. Doe's proposed topics and sample questions for Jane Roe's deposition (Dkt. No. 97). Mr. Doe is prepared to file such letter reply within 24 hours of the Court granting the requested leave.

This request is being made to address certain issues raised in Princeton's six-page oversized response, including its mischaracterization of the pertinent legal authority and its stated concerns regarding the nature of the questions. *See* Dkt. No. 98 (limiting Princeton's submission to three pages). Because Princeton's response suggests that Mr. Doe is attempting to retry the disciplinary matter, he requests the opportunity to clarify how the anticipated questions and topics will do no such thing and are within the bounds of the Court's order.

For example, with respect to Topic 3, Princeton contends that it is concerned that Ms. Roe will be asked to "respond to assertions that her testimony changed or conflicted," as though she will be asked to explain her testimony or reconcile statements. But such concern is misplaced because Topic 3, by its terms, only seeks to address what "*the panel* ask[ed]" her about such statements, what "*they* ask[ed] specifically," and whether *they* provided a "suggested explanation" to her. *See* Dkt. No. 97 at 3 (emphasis added). Permitting Mr. Doe the opportunity to provide the Court with additional clarity and explanation may likely resolve several of Princeton's stated issues.

Respectfully submitted,

/s/ Jamie Hoxie Solano
Jamie Hoxie Solano

Counsel to Plaintiff John Doe